

TASHA PARIS CHALFANT (SBN 207055)  
THE LAW OFFICE OF TASHA PARIS CHALFANT  
5701 Lonetree Blvd., Suite 312  
Rocklin, California 95765  
Tel. (916) 444-6100  
Fax (916) 930-6093  
E-mail: tashachalfant@gmail.com

Attorney for Defendant  
**DARRYL LYNN KAUFFMAN**

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA, ) No. 2:22-cr-0225 DJC  
Plaintiff, )  
v. ) STIPULATION REGARDING  
DARRYL LYNN KAUFFMAN, ) EXCLUDABLE TIME PERIODS UNDER  
Defendant. ) SPEEDY TRIAL ACT; FINDINGS AND  
 ) ORDER  
 )  
 )  
 )  
 )  
 )

## STIPULATION

Plaintiff United States of America, by and through its counsel of record Assistant United States Attorney HEIKO COPPOLA, and the Defendant, DARRYL LYNN KAUFFMAN, by and through his counsel of record TASHA PARIS CHALFANT, hereby stipulate and request that the Court make the following findings and Order as follows:

1. By previous order, this matter was set for a status conference before Judge Dale A. Drozd on June 13, 2023, with time excluded to that date.

2. This case was recently reassigned to Judge Daniel J. Calabretta and all dates were vacated, Dkt. 19.

**STIPULATION AND ORDER FOR CONTINUANCE OF STATUS CONFERENCE  
AND FOR EXCLUSION OF TIME**

3. By this stipulation, the defendant now moves to continue the status conference until August 24, 2023, at 9:00 a.m., and to exclude time between June 13, 2023, and August 24, 2023, under Local Code T4. Plaintiff does not oppose this request.

3. The parties agree and stipulate, and request that the Court find the following:

a. The government has represented that the discovery associated with this case includes approximately 46,000 plus pages of investigative reports in electronic form, and some audio and video files. All of this discovery has been either produced directly to counsel, and/or made available for inspection and copying.

b. Counsel for the defendant desires additional time to review the voluminous discovery, develop the case, conduct investigation, consult with her client, discuss potential resolution, and to explain the consequences and guidelines.

c. Counsel for the defendant believes that failure to grant the above-requested continuance would deny her the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

d. The government does not object to the continuance.

e. Based on the above-stated findings, the ends of justice served by continuing the case as requested outweigh the interest of the public and the defendant in a trial within the original date prescribed by the Speedy Trial Act.

f. For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period of June 13, 2023, to August 24, 2023, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4] because it results from a continuance granted by the Court at defendant's request on the basis of

STIPULATION AND ORDER FOR CONTINUANCE OF STATUS CONFERENCE

AND FOR EXCLUSION OF TIME

1 the Court's finding that the ends of justice served by taking such action outweigh the best interest  
2 of the public and the defendant in a speedy trial.

3 4. Nothing in this stipulation and order shall preclude a finding that other  
provisions of the Speedy Trial Act dictate that additional time periods are excludable from the  
5 period within which a trial must commence.  
6

7 All counsel has reviewed this proposed order and authorized Tasha Chalfant to sign it on  
8 their behalf.

9 IT IS SO STIPULATED.

10 Dated: May 3, 2023 by: /s/Tasha Chalfant for \_\_\_\_\_  
11 HEIKO COPPOLA  
12 Assistant U.S. Attorney  
13 Attorney for Plaintiff

14 Dated: May 3, 2023 by: /s/Tasha Chalfant \_\_\_\_\_  
15 TASHA CHALFANT  
16 Attorney for Defendant  
17 DARRYL LYNN KAUFFMAN  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27

28 STIPULATION AND ORDER FOR CONTINUANCE OF STATUS CONFERENCE

AND FOR EXCLUSION OF TIME

## ORDER

The Court, having received, read, and considered the stipulation of the parties, and good cause appearing therefrom, adopts the stipulation of the parties in its entirety as its order. Based on the stipulation of the parties and the recitation of facts contained therein, the Court finds that the failure to grant a continuance in this case would deny defense counsel reasonable time necessary for effective preparation, taking into account the exercise of due diligence. The Court finds that the ends of justice to be served by granting the requested continuance outweigh the best interests of the public and the defendant in a speedy trial.

The Court orders that the time from the date of the parties' stipulation, June 13, 2023, to and including August 24, 2023, status conference hearing date shall be excluded from computation of time within which the trial of this case must be commenced under the Speedy Trial Act, pursuant to 18 U.S.C §3161(h)(7)(A) and (B) (iv), and Local Code T4 (reasonable time for defense counsel to prepare). It is further ordered that the presently set June 13, 2023, status conference shall be continued to August 24, 2023, at 9:00 a.m.

IT IS SO FOUND AND ORDERED this 5<sup>th</sup> day of May, 2023.

Dated: May 5, 2023

/s/ Daniel J. Calabretta

---

THE HONORABLE DANIEL J. CALABRETTA  
UNITED STATES DISTRICT JUDGE

**STIPULATION AND ORDER FOR CONTINUANCE OF STATUS CONFERENCE  
AND FOR EXCLUSION OF TIME**